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Attorneys for Defendant
HEIDI EDWARDS

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:22-cr-00161-JAM
)
Plaintiff,) STIPULATION AND ORDER TO CONTINUE
) STATUS CONFERENCE AND EXCLUDE TIME
vs.)
)
JAMES MECHAM, KURT) Date: July 25, 2023
STOCKS, &) Time: 9:00 A.M.
HEIDI EDWARDS,) Judge: Hon. John A. Mendez
)
<u>Defendants.</u>)

IT IS HEREBY STIPULATED and agreed by and between United States Attorney Phillip A. Talbert, through Assistant United States Attorney Heiko Coppola, counsel for Plaintiff; Thomas A. Johnson, counsel of record for James Mecham; Malcolm S. Segal, counsel of record for Kurt Stocks; and Federal Defender Heather Williams, through Assistant Federal Defender Christina Sinha, counsel for Heidi Edwards, that the status conference, currently set for July 25, 2023 can be continued to **November 14, 2023, at 09:00 a.m.**, and that time may be excluded as detailed below.

The above-named parties specifically stipulate as follows:

1. By previous order, the status conference as to all defendants in this matter was continued to July 25, 2023. ECF No. 32.
2. With the instant stipulation, all parties now seek to continue the status conference to November 14, 2023, and to exclude time under Local Code T-4 from July 25,

2023 through November 14, 2023.

3. Defense counsel for all defendants represents that they require additional time to conduct legal research in this case, which involves the interplay of federal law, California law, and Arizona law; conduct defense investigations; research defenses; explore potential resolutions; and otherwise prepare for trial. Counsel believes that failure to grant the requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

4. The government does not object to the continuance.

5. Therefore, the parties stipulate that the ends of justice served by granting the continuance outweighs the best interest of the public and all defendants in a speedy trial, and respectfully request the Court so to find. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (the Speedy Trial Act), the parties request that the time period between July 25, 2023 and November 14, 2023 (inclusive) be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public and all defendants in a speedy trial.

The parties therefore respectfully request this Court to adopt the parties' stipulation, detailed above, in full as its Order.

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Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: July 17, 2023

/s/ Christina Sinha
CHRISTINA SINHA
Assistant Federal Defender
Attorneys for Defendant
HEIDI EDWARDS

Date: July 17, 2023

/s/ Thomas A. Johnson
THOMAS A. JOHNSON
Attorney for Defendant JAMES MECHAM

Date: July 17, 2023

/s/ Malcolm S. Segal
MALCOLM S. SEGAL
Attorney for Defendant KURT STOCKS

Date: July 17, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ Heiko Coppola
HEIKO COPPOLA
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, **ADOPTS** the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: July 18, 2023

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE